

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Philadelphia Division

IN RE:
JOSEPH GEORGE

Deutsche Bank Trust Company Americas f/k/a
Bankers Trust Company, as Trustee for Saxon
Asset Securities Trust 2000-3, Mortgage Loan
Asset Backed Certificates, Series 2000-3,
Movant

vs.

JOSEPH GEORGE,
Debtor

Case No. 17-14689-amc
Chapter 13

**OBJECTION TO CONFIRMATION
OF DEBTOR'S CHAPTER 13 PLAN**

Deutsche Bank Trust Company Americas f/k/a Bankers Trust Company, as Trustee for
Saxon Asset Securities Trust 2000-3, Mortgage Loan Asset Backed Certificates, Series 2000-3
("Movant"), by and through its undersigned counsel, files this *Objection to Confirmation of
Debtor's Chapter 13 Plan* (Doc 302), and states as follows:

1. The Debtor filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy
Code on July 11, 2017.
2. Movant holds a security interest in the Debtor's real property located at 1335
Passmore Street, Philadelphia, PA 19111 (the "Property"), by virtue of a Mortgage which is
recorded as instrument Number 50148362 in Official Records of Philadelphia County,
Pennsylvania. Said Mortgage secures a Note in the amount of \$30,150.00.

3. The Debtor filed an Amended Chapter 13 Plan (the “Plan”) on March 17, 2022 (Doc 302).

4. Movant filed a Proof of Claim in this case on August 21, 2018 (Claim No. 13-1) which lists a total debt of \$33,250.36.

5. It should be noted that the Debtor’s loan matures during the pendency of the Plan period.

6. The Debtor needs to include the interest of 10.78% until the plan end date.

7. Movant objects to Debtor’s Amended Plan as it does not include the aforementioned interest rate.

WHEREFORE, Movant respectfully requests the entry of an Order which denies confirmation of the Plan unless such plan is amended to overcome the objections of Movant as stated herein, and for such other and further relief as the Court may deem just and proper.

/s/Andrew Spivack

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Matt Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

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FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
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<p>IN RE: <u>JOSEPH GEORGE</u></p> <p>Deutsche Bank Trust Company Americas f/k/a Bankers Trust Company, as Trustee for Saxon Asset Securities Trust 2000-3, Mortgage Loan Asset Backed Certificates, Series 2000-3, Movant</p> <p>vs.</p> <p>JOSEPH GEORGE, Debtor</p>	<p>Case No. 17-14689-amc Chapter 13</p>
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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Objection To Confirmation Of Debtor(S)' Chapter 13 Plan has been electronically served or mailed, postage prepaid on this day to the following:

Joseph George
508 Solly Ave
Philadelphia, Pa 19111-1906

Robert Leite-Young, Debtor's Attorney
6950 Castor Avenue
Philadelphia, PA 19149

Kenneth E West, Bankruptcy Trustee
Office of the Chapter 13 Standing Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107

United States Trustee , US Trustee
Office of United States Trustee
200 Chestnut Street, Suite 502
Philadelphia, PA 19106

April 15, 2022

/s/Andrew Spivack

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